

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Minor Correction to Product Description
in Mail Classification Schedule

Docket No. MC2020-8

PUBLIC REPRESENTATIVE COMMENTS

(November 6, 2019)

On October 9, 2019, the Postal Service filed a notice of minor classification changes pursuant to 39 C.F.R. § 3020.90 to the Priority Mail Express International (PMEI) product descriptions that appear in the Mail Classification Schedule (MCS).¹ On October 10, 2019, the Commission issued an order to obtain public comments and appointed the undersigned Public Representative.²

In Order No. 3722, the Commission directed the Postal Service to “file a notice of a minor classification change pursuant to 39 C.F.R. § 3020.90 when it revises the list of destinations or related weight steps eligible for the [PMEI] discount.”³ The Postal Service asserts that “[t]he purpose of these minor modifications is to establish changes to PMEI relating to the list of destination countries offered at a discount at retail, as provided in section 2305.6 of the MCS.” Notice at 1. It proposes an effective date of January 26, 2020. *Id.*

The Public Representative has reviewed the Notice, proposed classification changes, and applicable statutory and regulatory provisions. First, the Public Representative finds that the proposed changes will “ensure that product descriptions in the [MCS] accurately represent” the Postal Service’s current offerings by informing postal retail customers of the

¹ Notice of United States Postal Service of Filing Minor Changes to a Product Description, October 9, 2019 (Notice).

² Notice and Order Concerning Minor Changes to Product Description, October 10, 2019 (Order No. 5271).

³ Docket No. MC2017-80, Order Approving Minor Corrections to Product Description in Mail Classification Schedule, February 6, 2017, at 6 (Order No. 3772).

products eligible for the PMEI discount. See 39 C.F.R. § 3020.90(a); Notice at 2. Second, the Postal Service filed notice of the minor classification changes at least 15 days before the proposed effective date of January 26, 2020. See 39 C.F.R. § 3020.90(b). Third, the proposed classification changes do not constitute material changes to the product description because these changes merely revise the MCS without otherwise changing applicable product offerings, prices, or price groups. See *id.* § 3020.90(c)(1); Notice at 2. Fourth, the proposed corrections are consistent with title 39 because “[t]he proposed modifications do not significantly change the user experience for any product and there is no evidence that the proposed modifications will significantly impact competitors.” Notice at 2; see 39 C.F.R. § 3020.90(c)(2). Fifth, the Notice includes applicable sections of the MCS and proposed corrections in legislative format. Notice at 4; see 39 C.F.R. § 3020.90(c)(3).

Based on this review, the Public Representative concludes that the proposed MCS changes are minor classification changes that comply with 39 C.F.R. § 3020.90. The Notice also complies with the Commission’s directive in Order No. 3772.

Respectfully submitted,

Katrina R. Martinez

Public Representative